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**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

**CENTER FOR BIOLOGICAL
DIVERSITY,**

Plaintiff,

v.

DEBRA HAALAND, in her official capacity
as Secretary of the U.S. Department of the
Interior, and **MARTHA WILLIAMS**, in her
official capacity as Director of the U.S. Fish
and Wildlife Service.

Defendants.

No. 1:22-cv-00335-DAD-BAK

**JOINT MOTION FOR A 30-DAY
STAY OF PROCEEDINGS**

The Parties respectfully request that the Court grant this joint motion for a 30-day stay of proceedings in the above-referenced case until June 26, 2022. In support of this motion, the Parties state as follows:

The Parties seek a 30-day stay of proceedings so that they may confer in regard to a possible negotiated resolution of this matter and this is the first request for a stay in proceedings.

Accordingly, in the interest of judicial economy and the Parties' interest in avoiding further litigation, the Parties now seek a 30-day stay until June 26, 2022, to allow the Parties to attempt to resolve this case without the Court's further involvement. Additionally, the stay will avoid expending the Parties' or the Court's resources with potentially unnecessary filings. *Landis v. North American Co.*, 299 U.S. 248, 255 (1936) ("[T]he power to stay proceedings is incidental to the power inherent in every court to control the disposition of the cases on its docket with economy of time and effort for itself, for counsel, and for litigants.").

Therefore, the Parties respectfully request that the Court enter an order as follows:

1. All proceedings in the above-captioned litigation are stayed until June 26, 2022.
2. The Parties will file a joint status report by June 26, 2022, to update the Court on the status of the matter.
3. Defendants' deadline to file an Answer on May 27, 2022, is hereby vacated. The Parties will propose a new deadline to file an Answer, if appropriate, in the above-mentioned joint status report.

Dated: May 26, 2022

Respectfully submitted,

/s/ Jason Rylander

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/s/ Lauren Parker

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Eastern District of California by using the CM/ECF system, which will serve a copy of the same on the counsel of record.

/s/ Chris Carrara